

MUR # 7314

**OFFICE OF
GENERAL COUNSEL**

BEFORE THE 2018 JAN 24 PM 12: 57
FEDERAL ELECTION COMMISSION

Brad Woodhouse
American Democracy Legal Fund
455 Massachusetts Avenue, NW
Washington, DC 20001

Complainant,

v.

National Rifle Association of America
11250 Waples Mill Road
Fairfax, VA 22030

National Rifle Association Institute for Legislative Action
11250 Waples Mill Road
Fairfax, VA 22030

Respondents.

COMPLAINT

Complainant files this complaint with the Federal Election Commission (the "FEC" or "Commission") under 52 U.S.C. § 30109(a)(1) against the National Rifle Association of America ("NRA") and the National Rifle Association Institute for Legislative Action ("NRA-ILA") (collectively, "Respondents") for violating the Federal Election Campaign Act of 1971, as amended (the "Act") and Commission regulations, as described below. According to news sources, the Federal Bureau of Investigations ("FBI") is currently investigating whether Respondents received illegal contributions from foreign nationals in connection with the 2016 presidential election. Given the severity of these allegations, we request an immediate investigation by the Commission into these claims, both to determine the scope of any violations and to take appropriate remedial action against Respondents.

A. Factual Background

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Organized as a nonprofit corporation under Section 501(c)(4) of the Internal Revenue Code,¹ the NRA considers itself “the premier firearms education organization in the world.”² The NRA’s separate segregated fund—the National Rifle Association of America Political Victory Fund (“NRA-PVF”)—is currently registered with the FEC as a political committee, financing political activity in connection with federal and nonfederal elections around the country.³ The NRA-ILA is the lobbying arm of the NRA — its legislative programs and activities are reported each year on the NRA’s Form 990 tax returns.⁴ The NRA, NRA-ILA, and NRA-PVF spent nearly \$55 million dollars in connection with federal elections in 2016.⁵ Of that \$55 million, \$30 million was spent in support of Republican candidate Donald Trump, which is “triple what the group devoted to backing Republican Mitt Romney in the 2012 presidential race.”⁶ The majority of money spent by the NRA in connection with the 2016 presidential election was reportedly spent by the NRA-ILA, which is not required to disclose its donors to the public.⁷

According to news sources, “links between Russia and the NRA have drawn the attention of federal investigators” raising the question of “whether a top Russian banker with ties to the Kremlin illegally funneled money to the National Rifle Association to help Donald Trump win the presidency.”⁸ The Russian banker in question, Alexander Torshin, currently serves as the

¹ National Rifle Association of America, 2015 Form 990 (excerpts attached as Exhibit A).

² A Brief History of the NRA, National Rifle Association, available at <https://home.nra.org/about-the-nra/>.

³ National Rifle Association of America Political Victory Fund, FEC Statement of Organization (filed Nov. 19, 2015).

⁴ See 2015 Form 990, *supra* note 1, Part III, Line 4c (reporting more than \$24 million on legislative programs).

⁵ Peter Stone & Greg Gordon, *FBI Investigating Whether Russian Money Went to NRA to Help Trump*, McClatchy (Jan. 18, 2018), available at <http://www.mcclatchydc.com/news/nation-world/national/article195231139.html>; see also NRA Outside Spending Summary 2016, OpenSecrets.org, available at <https://www.opensecrets.org/outsidespending/detail.php?cycle=2016&cmte=National%20Rifle%20Assn&cyc=2016> (last accessed Jan. 21, 2018).

⁶ Stone & Gordon, *supra* note 5; see also NRA Outside Spending Summary 2012, OpenSecrets.org, available at <https://www.opensecrets.org/outsidespending/detail.php?cycle=2012&cmte=National+Rifle+Assn> (last accessed Jan. 21, 2018).

⁷ Stone & Gordon, *supra* note 5; see also General Instructions for Schedule B, Form 990, available at <https://www.irs.gov/pub/irs-pdf/t990ezb.pdf>.

deputy governor of Russia's central bank and "is known for his close relationships with both Russian President Vladimir Putin and the NRA."⁹

Mr. Torshin's ties to the NRA date back to 2011, when he was introduced to the organization's president and invited to attend subsequent NRA conventions in the United States.¹⁰ With his so-called protégé, Maria Butina, Torshin eventually helped create a similar gun rights group in Moscow called the "Right to Bear Arms."¹¹ Through this organization, Torshin and Butina met fellow NRA member and conservative operative Paul Erickson — an adviser to the Trump transition team who helped raise money for the NRA.¹² In 2015, Torshin and Butina "hosted a luxurious trip to Russia for NRA leaders" including Mr. Erickson and other top-level NRA donors.¹³ The following year, Ms. Butina and Mr. Erickson incorporated a company together in Mr. Erickson's home state of South Dakota: Bridges LLC.¹⁴ While it is not clear what the company does and "[p]ublic records don't reveal any financial transactions involving Bridges [LLC]...Erickson said the firm was established in case Butina needed any monetary assistance for her graduate studies."¹⁵

⁹ Stone & Gordon, *supra* note 5; Lois Beckett, *FBI Investigates Whether Russia Banker Used NRA to Fund Trump Campaign - Report*, The Guardian (Jan. 18, 2018), available at <https://www.theguardian.com/us-news/2018/jan/18/trump-nra-fbi-alexander-torshin-russia-investigation>.

¹⁰ Stone & Gordon, *supra* note 5; see also Rosalind S. Helderman & Tom Hamburger, *Guns and Religion: How American Conservatives Grew Closer to Putin's Russia*, Wash. Post (Apr. 30, 2017), available at https://www.washingtonpost.com/politics/how-the-republican-right-found-allies-in-russia/2017/04/30/e2d83ff6-29d3-11e7-a616-d7c8a68c1a66_story.html?utm_term=.4385c90173b3.

¹¹ Helderman & Hamburger, *supra* note 9; Stone & Gordon, *supra* note 5.

¹² Stone & Gordon, *supra* note 5; Helderman & Hamburger, *supra* note 9.

¹³ Stone & Gordon, *supra* note 5; see also Michelle Goldberg, *Is This the Collusion We Were Waiting For?*, N.Y. Times (Jan. 19, 2018), available at <https://www.nytimes.com/2018/01/19/opinion/nra-russia-investigation-trump.html>; Michael Isikoff, *White House Pulled out of Meet and Greet with 'Conservatives' Favorite Russian Over Suspected Mob Ties*, Yahoo News (Apr. 2, 2017), available at <https://www.yahoo.com/news/white-house-pulled-out-of-meet-and-greet-with-conservatives-favorite-russian-a-suspected-mobster-060026495.html>.

¹⁴ Helderman & Hamburger, *supra* note 9; Goldberg, *supra* note 12.

¹⁵ Stone & Gordon, *supra* note 5; Nicholas Fandos, *Operative Offered Trump Campaign 'Kremlin Connection' Using N.R.A. Ties*, N.Y. Times (Dec. 3, 2017), available at <https://www.nytimes.com/2017/12/03/us/politics/trump-putin-russia-nra-campaign.html>; see also Bridges LLC Business Entity Detail, S.D. Sec'y of State, available at <https://sosenterprise.sd.gov/BusinessServices/Business/FilingDetail.aspx?CN=064236191089001247030098158165155023024203221157> (last accessed Jan. 21, 2018).

¹⁶ Stone & Gordon, *supra* note 5.

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Relying on his NRA connections, news sources report repeated attempts by Mr. Torshin to contact the Trump campaign in 2016, specifically seeking a one-on-one meeting with Donald Trump.¹⁶ For example, in May of 2016, Mr. Erickson sent an email on Torshin's behalf to a Trump campaign advisor, "tr[ying] to arrange a personal meeting with Trump [in connection with] the NRA convention" in Louisville, Kentucky.¹⁷ According to news sources, the email from Erickson "bore the subject line 'Kremlin Connection'" and explained that "Russia... was 'quietly but actively seeking dialogue with the U.S.' and would attempt to use the NRA's annual convention... to make 'first contact.'"¹⁸ While the Trump campaign declined Mr. Torshin's meeting request, Mr. Torshin did reportedly share a table with Donald Trump, Jr. during a private dinner at the convention that year, just before the NRA officially endorsed Donald Trump for president.¹⁹

In June of 2016, Torshin tried to set up another "backchannel meeting between Trump and Torshin" but the campaign declined his request again.²⁰ Even after the election, Mr. Torshin continued to seek a meeting with now-President Trump, and was finally successful in scheduling a meet-and-greet with the President in connection with the National Prayer Breakfast in February of 2017.²¹ That meeting was canceled at the last minute, reportedly due to recent allegations made by the Spanish Civil Guard that Mr. Torshin "directed dirty money" and aided in the money laundering of "ill-gotten gains through banks and properties in Spain."²²

¹⁶ *Id.*; Helderman & Hamburger, *supra* note 9; Goldberg, *supra* note 12.

¹⁷ Stone & Gordon, *supra* note 5; *see also* Fandos, *supra* note 14.

¹⁸ Fandos, *supra* note 14.

¹⁹ Stone & Gordon, *supra* note 5; Helderman & Hamburger, *supra* note 9; Esteban Duarte, Henry Meyer & Evgenia Pismennaya, *Mobster or Central Banker? Spanish Cops Allege This Russian Both*, Bloomberg Markets (Aug. 9, 2016), available at <https://www.bloomberg.com/news/articles/2016-08-09/mobster-or-central-banker-spanish-cops-allege-this-russian-both>.

²⁰ Sam Thielman, *NRA's Ties to Putin Allies Go Back Years*, Talking Points Memo (Jan. 19, 2018), available at <https://talkingpointsmemo.com/muckraker/nras-ties-to-putin-allies-go-back-years>.

²¹ Stone & Gordon, *supra* note 5.

²² Duarte, Meyer & Pismennaya, *supra* note 19.

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In implementing the prohibition against providing substantial assistance to foreign nationals, the Commission determined the rule was “necessary...to prevent foreign national funds from influencing elections.”²⁹ For these purposes, “substantial assistance” means “active involvement in the solicitation, making, receipt or acceptance of a foreign national contribution or donation with an intent to facilitate successful completion of the transaction.”³⁰ In making this rule, the Commission made clear that the prohibition “covers, but is not limited to, those persons who act as conduits or intermediaries for foreign national contributions or donations.”³¹

Finally, the Act prohibits participation by foreign nationals in decisions involving election-related activities, including a prohibition on foreign nationals directing, dictating, controlling, or directly or indirectly participating in the decision-making process of any corporation, political organization or political committee with regard to that entity’s election-related activities.³² This prohibition extends to decisions concerning the making of contributions, donations, expenditures or disbursements in connection with elections.³³ Persons guilty of using foreign money to influence an American election through any of the methods described herein could be subject to both civil fines and criminal prosecution under federal law.³⁴

As a 501(c)(4) organization, the NRA (and the NRA-ILA by extension) can generally accept contributions from foreign nationals to support its non-electoral activities and is not required to disclose its donors to the public when filing its annual Form 990 with the Internal Revenue Service.³⁵ However, neither the 501(c)(4) nor its political committee, NRA-PVF, can

²⁹ 11 C.F.R. § 120(a)(4); FEC Adv. Op. 2016-10 (Parker).

³⁰ *Explanations and Justification, Assisting Foreign National Contributions or Donations*, 67 Fed. Reg. 69,928, 69,945 (Nov. 19, 2002).

³¹ *Id.*

³² 67 Fed. Reg. at 69,945-46.

³³ 11 C.F.R. § 110.20(i).

³⁴ 67 Fed. Reg. at 69,945.

³⁵ See 52 U.S.C. § 30109(a)(6), (d) (providing for civil and criminal penalties for knowing and willful violations).

³⁶ General Instructions for Schedule B, Form 990, available at <https://www.irs.gov/pub/irs-pdf/f990czb.pdf>.

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(i) provide substantial assistance to facilitate the spending of foreign money to influence an American election, (ii) act as a conduit for an otherwise illegal foreign political contributions, or (iii) allow for a foreign national to participate in election-related decisions regarding the organization's activities.³⁶ NRA-PVF is further prohibited from soliciting, accepting, or receiving a contribution or donation from any foreign national and is required to disclose its donors to the FEC.³⁷

According to sources, the NRA spent at least \$55 million dollars in connection with the 2016 election.³⁸ Only contributions received by the NRA-PVF in connection with the 2016 election will be disclosed to the public. To put it another way, at least \$33 million was spent to influence federal elections in 2016, but the public will never learn the source of those contributions. This is particularly problematic given the news reports detailed above and the longstanding relationship between the NRA and prominent foreign nationals in Russia whose interests in influencing the outcome of the 2016 presidential election cannot be denied.

News sources indicate that Mr. Torshin was deliberately if not exclusively interested in the electoral activities of the NRA.³⁹ His repeated attempts at contacting the Trump campaign and meeting with Donald Trump demonstrate an obvious interest in participating in and influencing the 2016 election. Moreover, Mr. Torshin used his NRA contacts to facilitate these conversations and meeting requests with the Trump campaign.⁴⁰ In fact, Mr. Torshin was so deeply involved in the NRA's organization that Glenn Simpson of Fusion GPS—the research company hired to do opposition research on candidate Donald Trump—told Congress that the

³⁶ 11 C.F.R. § 110.20(g), (h), (i).

³⁷ *Id.* §§ 104.3(a)(2), 110.20(b).

³⁸ Stone & Gordon, *supra* note 5.

³⁹ *Id.*; Helderman & Hamburger, *supra* note 9.

⁴⁰ Stone & Gordon, *supra* note 5; Helderman & Hamburger, *supra* note 9.

Russians had “infiltrated” the NRA, specifically naming Alexander Torshin and Maria Butina in his testimony.⁴¹

By infiltrating the NRA and gaining unfettered access to NRA donors and leaders, Mr. Torshin and Ms. Butina would have participated in the NRA’s decision-making process regarding election-related activities — certainly indirectly if not directly. This relationship goes farther than simply attending NRA meetings. Mr. Torshin and Ms. Butina hosted a large group of top-level NRA donors in Moscow, and Ms. Butina then teamed up with NRA member and fundraiser Paul Erickson to form an LLC in advance of the 2016 election.⁴² While Mr. Erickson claims he and Ms. Butina formed this LLC to provide Butina with money for her graduate studies, news sources correctly characterize that as “an unusual way to use an LLC.”⁴³ In discussing the Butina-Erickson LLC, a different news source adds: “Here’s another way LLCs could be used: as an intermediary between foreign agents and tax-exempt organizations that are not required by law to disclose their donors.”⁴⁴ Given allegations made against Mr. Torshin by the Spanish Civil Guard,⁴⁵ this would not be the first time Mr. Torshin or those associated with him were accused of funneling money illegally.

Mr. Torshin and Ms. Butina had approximately 33 million opportunities to funnel foreign funds through the NRA, either directly through the NRA-ILA or indirectly through Bridges LLC and then the NRA. Because the NRA had reason to know of Mr. Torshin’s objectives in influencing the 2016 presidential election, and had reason to know that any funds solicited by Mr. Torshin or Ms. Butina on behalf of the NRA would be solicited impermissibly from foreign

⁴¹ Simpson Testimony, *supra* note 23.

⁴² Fandos, *supra* note 14; Stone & Gordon, *supra* note 5; Bridges LLC Business Entity Detail, S.D. Sec’y of State, available at <https://sosenterprise.sd.gov/BusinessServices/Business/FilingDetail.aspx?CN=064236191089001247030098158165155023024203221157> (last accessed Jan. 21, 2018).

⁴³ Stone & Gordon, *supra* note 5.

⁴⁴ Goldberg, *supra* note 12.

⁴⁵ Duarte, Meyer & Pismennaya, *supra* note 19.

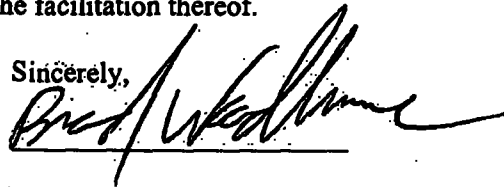
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nationals, Respondents are complicit in any scheme that took place in connection with these individuals. The FEC purposefully added conduits and intermediaries to the prohibition on substantial assistance to prohibit such an arrangement. While the FBI and U.S. House of Representatives are both investigating the potential money trail from Torshin to the NRA, this question falls squarely within the FEC's jurisdiction and should be investigated by the Commission.


REQUESTED ACTION

We respectfully request that the Commission investigate these claims and any additional coordination between Respondents and foreign nationals in connection with the 2016 presidential election. We also ask the Commission to enjoin Respondents from any further violations of the Act and assign the maximum fines permitted by law should the investigation lead to evidence of illegal foreign contributions or the facilitation thereof.

Sincerely,



SUBSCRIBED AND SWORN to before me this 22 day of January of 2018.


Notary Public

My Commission Expires:

11-30-2021



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Exhibit A

100-442801

Part III Statement of Program Service Accomplishments

Check if Schedule O contains a response or note to any line in this Part III ☒ **1** Briefly describe the organization's mission

Per NRA Bylaws, to protect and defend the U S Constitution to promote public safety, law and order, and national defense to train law enforcement agencies and civilians in marksmanship to promote shooting sports and hunting

- 2** Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? ☐ Yes ☒ No
- If "Yes," describe these new services on Schedule O
- 3** Did the organization cease conducting, or make significant changes in how it conducts, any program services? ☐ Yes ☒ No
- If "Yes," describe these changes on Schedule O
- 4** Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported

4a (Code) (Expenses \$ 45,404,733 including grants of \$ 28,901,812) (Revenue \$)

The gold standard in firearms training Please visit Explore NRA org to learn more Explore hunting programs, building the next generations of safe and responsible outdoor loving Americans Explore womens interests, promoting the largest growing demographic of new shooting enthusiasts Explore law enforcement, offering the best in law enforcement, military, and security firearms instruction Explore clubs and ranges, supporting a network of over 15,000 NRA-affiliated clubs, associations, and shops Explore competitive shooting, challenging shooters from novice to world-class levels to compete in more than 10,000 NRA-sanctioned matches Americas unique outdoor heritage is foundational to what makes this country great Be part of the NRAs mentoring movement by sharing your passion for the outdoors with a newcomer Fitting that first gun, stargazing from your campsite, signing your hunting license, these are some of the warm, life-affirming firsts to be celebrated and memorable experiences to be shared

4b (Code) (Expenses \$ 35,465,774 including grants of \$ 28,484,485) (Revenue \$)

Membership support The highest value of being an NRA member is gun safety and training, including regular reinforcement of these lessons by keeping engaged with the community of outdoor lovers and safe and responsible shooting enthusiasts NRA member communications give NRA members unrivaled content delivered through a growing multimedia platform, with real time, daily, weekly, and monthly updates, and the most authoritative coverage from subject matter experts The NRA publishes four NRA Official Journals for NRA members, other magazines, and specialty digital channels targeted to specific populations such as NRA Freestyle, NRA Women, and NRA Life of Duty, all part of NRA News There may be no other brand in America with a stronger suite of original programming aimed at educating, motivating, and entertaining audiences of all ages than the NRA The NRA does not wait for someone else to tell the stories of law-abiding gun owners Firearms safety is the cornerstone of everything the NRA does for members

4c (Code) (Expenses \$ 24,851,934 including grants of \$) (Revenue \$)

Legislative programs The NRA Institute for Legislative Action was created in 1975 to advocate on behalf of safe and responsible gun owners As the foremost protector and defender of the Second Amendment, the NRA promotes firearms safety, advocates against efforts to erode gun rights and freedoms, fights for initiatives aimed at reducing violent crime, and promotes hunters rights and conservation efforts NRA members recognize the vital importance of NRAs true grassroots work to preserve the Second Amendment for future generations of shooters and outdoor sportsmen and sportswomen This legion of engaged and motivated members is the reason for the NRAs strength NRAs legislative issues involve firearms and ammunition regulation, recreational shooting on public lands, gun registries, range preservation, veterans protection, international gun control threats, open and conceal carry laws, wildlife conservation, free speech, and a host of related matters Please visit NRAILA org for the most current research and information

4d Other program services (Describe in Schedule O)

(Expenses \$ 127,938,859 including grants of \$) (Revenue \$ 166,319,549)

4e Total program service expenses **233,661,300**

Part IV Checklist of Required Schedules

	Yes	No
1 Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	1	No
2 Is the organization required to complete Schedule B, Schedule of Contributors (see instructions)?	2 Yes	
3 Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I	3 Yes	
4 Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	4	
5 Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5 Yes	
6 Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I	6	No
7 Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	7	No
8 Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III	8 Yes	
9 Did the organization report an amount in Part X, line 21 for escrow or custodial account liability, serve as a custodian for amounts not listed in Part X, or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV	9	No
10 Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi-endowments? If "Yes," complete Schedule D, Part V	10 Yes	
11 If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X as applicable		
a Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI	11a Yes	
b Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII	11b	No
c Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	11c	No
d Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX	11d	No
e Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	11e Yes	
f Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	11f Yes	
12a Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII	12a Yes	
b Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional	12b Yes	
13 Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13	No
14a Did the organization maintain an office, employees, or agents outside of the United States?	14a	No
b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV	14b Yes	
15 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15	No
16 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16	No
17 Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I (see instructions)	17 Yes	
18 Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II	18 Yes	
19 Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III	19	No
20a Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H	20a	No
b If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	20b	

Part IV Checklist of Required Schedules (continued)

21	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II	21	Yes	
22	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III	22	Yes	
23	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? If "Yes," complete Schedule J	23	Yes	
24a	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a	24a		No
b	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?	24b		
c	Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?	24c		
d	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?	24d		
25a	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I	25a		No
b	Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I	25b		No
26	Did the organization report any amount on Part X, line 5, 6, or 22 for receivables from or payables to any current or former officers, directors, trustees, key employees, highest compensated employees, or disqualified persons? If "Yes," complete Schedule L, Part II	26		No
27	Did the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity or family member of any of these persons? If "Yes," complete Schedule L, Part III	27		No
28	Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions)			
a	A current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV	28a		No
b	A family member of a current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV	28b		No
c	An entity of which a current or former officer, director, trustee, or key employee (or a family member thereof) was an officer, director, trustee, or direct or indirect owner? If "Yes," complete Schedule L, Part IV	28c		No
29	Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M	29	Yes	
30	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? If "Yes," complete Schedule M	30		No
31	Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I	31		No
32	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete Schedule N, Part II	32		No
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? If "Yes," complete Schedule R, Part I	33		No
34	Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1	34	Yes	
35a	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a	Yes	
b	If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2	35b	Yes	
36	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? If "Yes," complete Schedule R, Part V, line 2	36		
37	Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI	37		No
38	Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 19? Note. All Form 990 filers are required to complete Schedule O	38	Yes	

Part V

Check if Schedule O contains a response or note to any line in this Part V

Check if Schedule O contains a response or note to any line in this Part V		Yes	No
1a	Enter the number reported in Box 3 of Form 1096 Enter -0- if not applicable	1a	1,105
b	Enter the number of Forms W-2G included in line 1a Enter -0- if not applicable	1b	0
c	Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners?	1c	Yes
2a	Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return	2a	852
b	If at least one is reported on line 2a, did the organization file all required federal employment tax returns? Note: If the sum of lines 1a and 2a is greater than 250, you may be required to e-file (see instructions)	2b	Yes
3a	Did the organization have unrelated business gross income of \$1,000 or more during the year?	3a	Yes
b	If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation in Schedule O	3b	Yes
4a	At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)?	4a	No
b	If "Yes," enter the name of the foreign country See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR)		
5a	Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?	5a	No
b	Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?	5b	No
c	If "Yes," to line 5a or 5b, did the organization file Form 8886-T?	5c	
6a	Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions?	6a	Yes
b	If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible?	6b	Yes
7	Organizations that may receive deductible contributions under section 170(c).		
a	Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor?	7a	
b	If "Yes," did the organization notify the donor of the value of the goods or services provided?	7b	
c	Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282?	7c	
d	If "Yes," indicate the number of Forms 8282 filed during the year	7d	
e	Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	7e	
f	Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?	7f	
g	If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required?	7g	
h	If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C?	7h	
8	Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year?	8	
9a	Did the sponsoring organization make any taxable distributions under section 4966?	9a	
b	Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?	9b	
10	Section 501(c)(7) organizations. Enter		
a	Initiation fees and capital contributions included on Part VIII, line 12	10a	
b	Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities	10b	
11	Section 501(c)(12) organizations. Enter		
a	Gross income from members or shareholders	11a	
b	Gross income from other sources (Do not net amounts due or paid to other sources against amounts due or received from them)	11b	
12a	Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041?	12a	
b	If "Yes," enter the amount of tax-exempt interest received or accrued during the year	12b	
13	Section 501(c)(29) qualified nonprofit health insurance issuers.		
a	Is the organization licensed to issue qualified health plans in more than one state? Note. See the instructions for additional information the organization must report on Schedule O	13a	
b	Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans	13b	
c	Enter the amount of reserves on hand	13c	
14a	Did the organization receive any payments for indoor tanning services during the tax year?	14a	No
b	If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O	14b	

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Part VI Governance, Management, and Disclosure

For each "Yes" response to lines 2 through 7b below, and for a "No" response to lines 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.

Check if Schedule O contains a response or note to any line in this Part VI ☒

Section A. Governing Body and Management

	Yes	No
1a Enter the number of voting members of the governing body at the end of the tax year If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O	76	
b Enter the number of voting members included in line 1a, above, who are independent	71	
2 Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee?		No
3 Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors or trustees, or key employees to a management company or other person?		No
4 Did the organization make any significant changes to its governing documents since the prior Form 990 was filed?		No
5 Did the organization become aware during the year of a significant diversion of the organization's assets?		No
6 Did the organization have members or stockholders?	Yes	
7a Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body?	Yes	
b Are any governance decisions of the organization reserved to (or subject to approval by) members, stockholders, or persons other than the governing body?	Yes	
8 Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:		
a The governing body?	Yes	
b Each committee with authority to act on behalf of the governing body?	Yes	
9 Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses in Schedule O		No

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)

	Yes	No
10a Did the organization have local chapters, branches, or affiliates?		No
b If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes?		
11a Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form?	Yes	
b Describe in Schedule O the process, if any, used by the organization to review this Form 990		
12a Did the organization have a written conflict of interest policy? If "No," go to line 13	Yes	
b Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?	Yes	
c Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe in Schedule O how this was done	Yes	
13 Did the organization have a written whistleblower policy?	Yes	
14 Did the organization have a written document retention and destruction policy?	Yes	
15 Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?		
a The organization's CEO, Executive Director, or top management official	Yes	
b Other officers or key employees of the organization	Yes	
If "Yes" to line 15a or 15b, describe the process in Schedule O (see instructions)		
16a Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year?		No
b If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements?		

Section C. Disclosure

17 List the States with which a copy of this Form 990 is required to be filed: AK, AL, AR, AZ, CA, CO, CT, DC, FL, GA, IL, KS, KY, LA, MA, MD, ME, MN, MO, MS, NC, ND, NH, NJ, NM, NY, OH, OK, OR, PA, RI, SC, TN, UT, VA, WA, WI, WV

18 Section 6104 requires an organization to make its Form 1023 (or 1024 if applicable), 990, and 990-T (501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply.
☐ Own website ☐ Another's website ☒ Upon request ☐ Other (explain in Schedule O)

19 Describe in Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year

20 State the name, address, and telephone number of the person who possesses the organization's books and records
 Wilson H Phillips Jr Treasurer Natl 11250 Waples Mill Road Fairfax, VA 220307400 (703) 267-1000

Check if Schedule O contains a response or note to any line in this Part VII ☒

☐ Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee

See Additional Data Table

1b	Sub-Total			
c	Total from continuation sheets to Part VII, Section A			
d	Total (add lines 1b and 1c)	10,619,447		538,192

3. Did the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule J for such individual

4. For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule J for such individual

5. Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule J for such person

	Yes	No
3		No
4	Yes	
5		No

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization ▶ 154

Part VIII Statement of RevenueCheck if Schedule O contains a response or note to any line in this Part VIII ☒

				(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512-514
Contributions, Gifts, Grants and Other Similar Amounts	1a	Federated campaigns	1a				
	b	Membership dues	1b				
	c	Fundraising events	1c				
	d	Related organizations	1d	19,068,256			
	e	Government grants (contributions)	1e				
	f	All other contributions, gifts, grants, and similar amounts not included above	1f	75,913,776			
	g	Noncash contributions included in lines 1a-1f \$		149,995			
	h	Total. Add lines 1a-1f		94,982,032			
Program Service Revenue	2a	Program fees	Business Code	14,590,207	14,590,207		
	b	Member dues		165,664,978	165,664,978		
	c						
	d						
	e						
	f	All other program service revenue					
	g	Total. Add lines 2a-2f		180,255,185			
	Other Revenue	3	Investment income (including dividends, interest, and other similar amounts)		1,108,539		
4		Income from investment of tax-exempt bond proceeds					
5		Royalties		17,820,307			17,820,307
6a		Gross rents	(i) Real	(ii) Personal			
			1,351,081				
b		Less rental expenses		2,045,386			
c		Rental income or (loss)		-694,305			
d		Net rental income or (loss)		-694,305			-694,305
7a		Gross amount from sales of assets other than inventory	(i) Securities	(ii) Other			
			21,093,303				
b		Less cost or other basis and sales expenses		21,929,859			
c		Gain or (loss)		-836,556			
d		Net gain or (loss)		-836,556			-836,556
8a		Gross income from fundraising events (not including \$ _____ of contributions reported on line 1c) See Part IV, line 18	a				
			823,987				
b	Less direct expenses	b	200,612				
c	Net income or (loss) from fundraising events		623,375			623,375	
9a	Gross income from gaming activities See Part IV, line 19	a					
b	Less direct expenses	b					
c	Net income or (loss) from gaming activities						
10a	Gross sales of inventory, less returns and allowances	a					
		21,445,536					
b	Less cost of goods sold	b	7,133,931				
c	Net income or (loss) from sales of inventory		14,311,605	13,288,158	1,023,447		
Miscellaneous Revenue				Business Code			
11a	Advertising		541800	24,702,441		24,702,441	
b	Subscriptions		541800	2,220,969	2,220,969		
c	Other unrelated business activity		900004	1,561,075		1,561,075	
d	All other revenue			654,571		654,571	
e	Total. Add lines 11a-11d			29,139,056			
12	Total revenue. See Instructions			336,709,238	195,764,312	27,286,963	18,675,931

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Part IX Statement of Functional Expenses**Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).**Check if Schedule O contains a response or note to any line in this Part IX ☒

Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments See Part IV, line 21	12,000	12,000		
2 Grants and other assistance to domestic individuals See Part IV, line 22	79,500	79,500		
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals See Part IV, lines 15 and 16	0			
4 Benefits paid to or for members	0			
5 Compensation of current officers, directors, trustees, and key employees	8,538,155	3,338,969	4,723,603	475,583
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)	0			
7 Other salaries and wages	38,762,627	29,751,362	6,383,787	2,627,478
8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)	7,397,948	4,712,450	2,168,676	516,822
9 Other employee benefits	5,304,035	3,892,944	1,040,550	370,541
10 Payroll taxes	3,405,382	2,499,411	668,071	237,900
11 Fees for services (non-employees)				
a Management	0			
b Legal	4,544,582	4,236,215	308,367	
c Accounting	124,970		124,970	
d Lobbying	1,144,100	1,144,100		
e Professional fundraising services See Part IV, line 17	4,997,495			4,997,495
f Investment management fees	113,365		113,365	
g Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)	0			
12 Advertising and promotion	36,948,713	30,059,840		6,888,873
13 Office expenses	7,529,022	4,649,329	2,879,693	
14 Information technology	10,159,314	5,758,299	4,401,015	
15 Royalties	0			
16 Occupancy	1,942,702	857,201	1,085,501	
17 Travel	7,695,386	5,718,842	1,976,544	
18 Payments of travel or entertainment expenses for any federal, state, or local public officials	0			
19 Conferences, conventions, and meetings	7,625,204	6,129,880	1,495,324	
20 Interest	1,259,802	818,036	441,766	
21 Payments to affiliates	0			
22 Depreciation, depletion, and amortization	3,453,780	2,529,536	924,244	
23 Insurance	1,188,011	1,188,011		
24 Other expenses Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
a Additional member communications expenses	68,369,024	50,399,454		17,969,570
b Additional training and community service expenses	33,302,500	33,302,500		
c Additional printing and publications expenses	24,712,927	24,712,927		
d Fulfillment materials	9,487,257	8,176,571	134,381	1,176,305
e All other expenses	15,436,766	9,693,923	2,983,192	2,759,651
25 Total functional expenses. Add lines 1 through 24e	303,534,567	233,661,300	31,853,049	38,020,218
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here <input type="checkbox"/> if following SOP 98-2 (ASC 958-720)				

Part X Balance SheetCheck if Schedule O contains a response or note to any line in this Part X ☐

		(A) Beginning of year		(B) End of year
Assets	1 Cash-non-interest-bearing		1	
	2 Savings and temporary cash investments	16,369,381	2	20,168,474
	3 Pledges and grants receivable, net	2,160,545	3	1,758,682
	4 Accounts receivable, net	57,547,085	4	64,092,546
	5 Loans and other receivables from current and former officers, directors, trustees, key employees, and highest compensated employees. Complete Part II of Schedule L		5	
	6 Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), persons described in section 4958(c)(3)(B), and contributing employers and sponsoring organizations of section 501(c)(9) voluntary employees' beneficiary organizations (see instructions). Complete Part II of Schedule L		6	
	7 Notes and loans receivable, net	3,018,999	7	3,004,582
	8 Inventories for sale or use	15,786,159	8	10,878,594
	9 Prepaid expenses and deferred charges	4,251,978	9	5,207,830
	10a Land, buildings, and equipment cost or other basis. Complete Part VI of Schedule D	10a 75,679,606		
	b Less accumulated depreciation	10b 38,792,542	10c	38,887,084
	11 Investments—publicly traded securities	59,225,582	11	60,176,258
	12 Investments—other securities. See Part IV, line 11	3,984,651	12	3,721,861
	13 Investments—program-related. See Part IV, line 11		13	
	14 Intangible assets		14	
	15 Other assets. See Part IV, line 11	6,723,371	15	6,943,734
16 Total assets. Add lines 1 through 15 (must equal line 34)	207,610,450	16	214,839,625	
Liabilities	17 Accounts payable and accrued expenses	78,771,321	17	78,902,061
	18 Grants payable		18	
	19 Deferred revenue	44,691,740	19	26,873,323
	20 Tax-exempt bond liabilities		20	
	21 Escrow or custodial account liability. Complete Part IV of Schedule D		21	
	22 Loans and other payables to current and former officers, directors, trustees, key employees, highest compensated employees, and disqualified persons. Complete Part II of Schedule L		22	
	23 Secured mortgages and notes payable to unrelated third parties	36,392,583	23	29,417,379
	24 Unsecured notes and loans payable to unrelated third parties		24	
	25 Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17-24). Complete Part X of Schedule D	5,155,082	25	4,288,700
	26 Total liabilities. Add lines 17 through 25	165,010,726	26	139,481,463
Net Assets or Fund Balances	Organizations that follow SFAS 117 (ASC 958), check here <input checked="" type="checkbox"/> and complete lines 27 through 29, and lines 33 and 34.			
	27 Unrestricted net assets	-1,013,786	27	27,802,714
	28 Temporarily restricted net assets	7,998,213	28	7,349,401
	29 Permanently restricted net assets	35,615,297	29	40,206,047
	Organizations that do not follow SFAS 117 (ASC 958), check here <input type="checkbox"/> and complete lines 30 through 34.			
	30 Capital stock or trust principal, or current funds		30	
	31 Paid-in or capital surplus, or land, building or equipment fund		31	
	32 Retained earnings, endowment, accumulated income, or other funds		32	
	33 Total net assets or fund balances	42,599,724	33	75,358,162
34 Total liabilities and net assets/fund balances	207,610,450	34	214,839,625	

Part XI Reconciliation of Net AssetsCheck if Schedule O contains a response or note to any line in this Part XI ☒

1	Total revenue (must equal Part VIII, column (A), line 12)	1	336,709,238
2	Total expenses (must equal Part IX, column (A), line 25)	2	303,534,567
3	Revenue less expenses Subtract line 2 from line 1	3	33,174,671
4	Net assets or fund balances at beginning of year (must equal Part X, line 33, column (A))	4	42,599,724
5	Net unrealized gains (losses) on investments	5	-2,173,402
6	Donated services and use of facilities	6	
7	Investment expenses	7	
8	Prior period adjustments	8	
9	Other changes in net assets or fund balances (explain in Schedule O)	9	1,757,169
10	Net assets or fund balances at end of year Combine lines 3 through 9 (must equal Part X, line 33, column (B))	10	75,358,162

Part XII Financial Statements and ReportingCheck if Schedule O contains a response or note to any line in this Part XII ☐

- 1** Accounting method used to prepare the Form 990 ☐ Cash ☒ Accrual ☐ Other _____
If the organization changed its method of accounting from a prior year or checked "Other," explain in Schedule O
- 2a** Were the organization's financial statements compiled or reviewed by an independent accountant?
If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both
☐ Separate basis ☐ Consolidated basis ☐ Both consolidated and separate basis
- b** Were the organization's financial statements audited by an independent accountant?
If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both
☐ Separate basis ☐ Consolidated basis ☒ Both consolidated and separate basis
- c** If "Yes," to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant?
If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O
- 3a** As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?
- b** If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits

	Yes	No
2a		No
2b	Yes	
2c	Yes	
3a		No
3b		